

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

AMERICAN ENVIRONMENTAL,
ENTERPRISES, INC. d/b/a THESAFETY
HOUSE.COM

Plaintiff,

v.

MANFRED STERNBERG, ESQUIRE and
MANFRED STERNBERG &
ASSOCIATES, PC, and CHARLTON
HOLDINGS GROUP, LLC and SAMUEL
GROSS,

Defendants.

CIVIL ACTION NUMBER:
2:22-cv-00688 (JMY)

(YOUNGE, U.S.D.J.)

ECF Case

NOTICE OF MOTION

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that upon the accompanying Declaration of Aaron C. Schlesinger, Esq. dated April 1, 2002, the Exhibits annexed thereto and Memorandum of Law submitted herein, the undersigned, on behalf of Defendants Manfred Sternberg, Esquire, Manfred Sternberg & Associates, PC, Charlton Holdings Group, LLC and Samuel Gross (collectively "Defendants"), will move this Court before the Honorable John Milton Younge, United States District Judge, at the United States District Court, Eastern District of Pennsylvania, James A Byrne U.S. Courthouse, 601 Market Street, Philadelphia, Pennsylvania 19106, for an Order, pursuant to Rules 12(b)(3) and (6) of the Federal Rules of Civil Procedure dismissing the Complaint of Plaintiff American Environmental, Enterprises, Inc. d/b/a TheSAFETYHOUSE.com. for improper venue and/or Forum *Non Conveniens*, together with attorneys' fees, costs and disbursements of this proceeding and for such other and further relief as this Court deems just and proper.

LAW OFFICES

Peckar &
Abramson

A Professional Corporation

Date: April 1, 2022

Respectfully submitted

/s/Aaron C. Schlesinger

AARON C. SCHLESINGER, ESQ.

PA Identification Number 90734

PECKAR & ABRAMSON, P.C.

Attorneys for Defendants,

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To: Gary P. Lightman, Esq.
Lightman & Manochi
156 Inverness Drive
Blue Bell, Pennsylvania 19422
garylightman@lightmanlaw.com

LAW OFFICES

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Abramson

A Professional Corporation

CERTIFICATION OF SERVICE

I hereby certify that on April 1, 2022 the within Motion to Dismiss Plaintiff's Complaint consisting of the Notice of Motion, Declaration of Aaron C. Schlesinger, Esq. with supporting Exhibits, Memorandum of Law and Proposed Order, were all electronically served pursuant to the Court's Electronic Mail ECF system upon:

Gary P. Lightman, Esq.
Lightman & Manochi
156 Inverness Drive
Blue Bell, Pennsylvania 19422
garylightman@lightmanlaw.com

/s/Aaron C. Schlesinger

AARON C. SCHLESINGER, ESQ.

Dated: April 1, 2022